

Exhibit O

Ryan Mark Waters

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

AFFIDAVIT OF
RYAN MARK WATERS

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF ERIE)

RYAN MARK WATERS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2010 Pontiac Road, Eden, New York 14057.

2. I am currently 37 years old, having been born on March 1, 1985.

3. I am the son of Gregory Alan Waters, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from tongue cancer on July 4, 2013, at the age of 60. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad and I had a good relationship. Growing up, he coached my football teams. We would take family trips and vacations together and enjoyed going camping and boating. He

also taught me how to use my hands and work on things around the house. And before he was diagnosed with cancer, I had bought a house, and he was helping me remodel it. Unfortunately, his diagnosis interrupted this project.

6. My father was an ironworker who was working on the Williamsburg Bridge at the time of the September 11, 2001, terrorist attacks. I remember calling him from a pay phone at school to check and make sure he was ok. He told me was fine at that time and that he would be going to Ground Zero to see if he could do anything. In the aftermath of the attacks, he helped with the cleanup at Ground Zero for a month or longer. I remember him telling us stories about these cleanup efforts.

7. My father's cancer diagnosis was devastating for him and our family. The treatments he had to undergo as a result of his cancer had other effects too. For example, his radiation treatments always wiped out his energy. And with his chemotherapy, he lost his hair, was unable to eat, and was dry in the mouth. He always needed a water bottle with him to help alleviate his dry mouth symptoms, but this would later lead to other hurdles and difficulties when he went places, as there were often restrictions on bringing outside water bottles in. My father would later need a feeding tube, and our whole family would help with this and making sure he received his meals. Dealing with this and the other health issues was very difficult for him.

8. There is nothing worse emotionally than watching someone you love getting mentally drained, undergoing chemotherapy and radiation treatments, and dying from the inside out.

9. I was also engaged at the time of my dad's diagnosis, and we had planned a destination wedding abroad. Unfortunately, because of my dad's health and restrictions, he was not able to travel abroad. We modified our wedding plans and had a local one instead. I have two children now, but my father was only alive to meet my oldest one. My second child never met him, and so she can only ask questions about him.

10. It was very difficult for me to watch my father get cancer and slowly pass away in front of me. The whole situation with the September 11, 2001, terrorist attacks and what

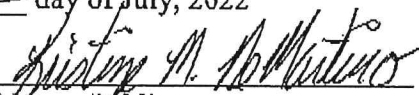
followed in its aftermath is tragic. It is a terrible event, and I wish that nobody had to go through any of it.



RYAN MARK WATERS

Sworn to before me this

21st day of July, 2022



Notary Public

KRISTINE M. DeMARTINO
No. 01DE5050179
Notary Public, State of New York
Qualified in Erie County
My Commission Expires 10/2/ 2025

Estate of Haskell Askin

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
SARA BELLE ASKIN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

SARA BELLE ASKIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 308 Van Avenue, Brick Township, New Jersey 08724.
2. I am currently 81 years old, having been born on March 29, 1941.
3. I am the wife of Haskell Askin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from esophageal cancer on January 27, 2011. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On March 25, 2011, I was issued Letters Testamentary on behalf of my husband's estate by the State of New Jersey, Ocean County Surrogate's Court.
6. Haskell and I had a solid, complementary, traditional relationship, with each supporting the other. We cared for our parents and his siblings. We volunteered and were

leaders in philanthropic and educational institutions. I helped support Haskell's general and forensic dentistry practice, assisting with employee support, financial, and managerial matters. We also collaborated on other business ventures. We traveled together to many of his conferences. We loved our children and tried to expose them to a variety of experiences. My husband loved to plan family activities. When we were married, he welcomed me into his world.

7. As a member of the disaster management planning group in the NYC Chief Medical Examiner's Office, Dr. Askin went to the pit at Ground Zero following 9/11/2001. He was a Tour Commander supervisor in addition to being a first responder. Eventually, the Medical Examiner's office was also designated as part of Ground Zero. When the fire engines drove up from downtown Ground Zero carrying remains, they parked right next to the dental trailer outside the Medical Examiner's office. You could smell the odor of death on the uncleaned fire engines. Haskell worked to collect dental records, identify remains of victims from the attack, and repatriate these parts to their families. He also documented dental evidence for which there were no available matches, at the time. Haskell interacted with the families of victims directly. When Haskell left the trailer for a break, the odor in the air was foul. He was breathing in this dust and handling dusty and toxic remains as well.

8. In 2008, Dr. Askin experienced pain upon swallowing when we returned from an overseas dental conference. We were at our son's home celebrating Haskell's birthday when we noticed that he was having trouble swallowing. We considered having a doctor check him out. As far as we knew, Haskell was solidly well and was not a complaining person. Our son is a gastroenterologist, so he made an appointment with one of his colleagues for Haskell to receive an endoscopy. The endoscopy revealed an abnormal growth. Haskell's records were sent to Sloan Kettering, and an appointment was made with an oncologist and a surgeon. After the exam, the doctors ordered that chemotherapy be started immediately.

9. Haskell started to lose weight. I had to buy him new shirts and slacks to fit his shrinking body. Soon, Haskell was put onto a PEJ tube (feeding tube), which undermined his independence and degree of wellness. His ability to eat became progressively worse, and his quality of life worsened as well. Towards the end of his life, he could only eat Pepsi-Cola ice chips. We moved into the room above our son's detached garage for two months because we

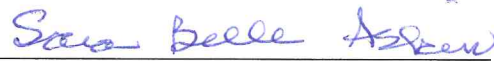
wanted more contact with our grandchildren (who were toddlers at the time) and to be closer to Haskell's doctors. We were away from the comfort and pleasure of our own home and community. I could feel Haskell's embarrassment when he was dependent on strange caregivers who violated his sense of privacy and independence. His sense of loss was ever-present. He withdrew socially and conversationally, even with his closest family members.

10. Haskell was aware of what he might be losing at the time he got sick. He knew his children and grandchildren were growing up and that he might be missing out on that. He didn't express this as much in words—but I could sense that it destroyed him emotionally. Still, he was hopeful. We arranged for a local doctor to check in on him periodically, and he received treatment at Sloan Kettering and Saint Barnabas Hospital. He had appropriate medical attention. He had social and family support. I don't know at what point he began to lose hope, but I think it was around the time his cancer started to spread.

11. Haskell's death took him out of my life as a companion and partner. After he died, the appreciation and application of Askin family values diminished. His loss created an opening for selfish and manipulative behavior to take hold in our family. As a result, our family relationship is fractured. Our daughter Davina put in a tremendous amount of effort taking care of her father before his death, his affairs after his death, and is now taking care of me. The time and effort she devoted and continues to devote cuts into her time and life choices. She travels from Manhattan to help me in New Jersey. I am fortunate and grateful that she is able and willing to assist me. I hope my family can rebalance and reconcile to have an equitable, healthy and happy future together.

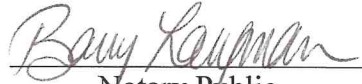
12. Haskell was a very productive person. He always wanted to help people. If there was an emergency with a patient during the night, he'd throw his clothes on over his pajamas and rush to the office to prepare for and provide the treatment he anticipated the patient might need. He had a keen mind, excellent health and energy, and dedication to those around him. He

was valued and loved by his family and in his residential and professional communities. He is missed every day.



SARA BELLE ASKIN

Sworn to before me this
18th day of July, 2022



Notary Public

BARRY LANGMAN
Notary Public, State of New York
No. 02LA5029645
Qualified in New York County
Commission Expires Dec. 27, 2022

Estate of Sheldon Barocas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

AFFIDAVIT OF
JOYCE E. BAROCAS

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

JOYCE E. BAROCAS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 21 South End Avenue, Apartment 625, New York, New York 10280.

2. I am currently 61 years old, having been born on February 18, 1961.

3. I am the sister of Sheldon Barocas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my brother's estate.

4. My brother passed away from metastasized prostate cancer on December 19, 2011, at the age of 61. It was medically determined that his illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On July 2, 2013, I was issued Letters Testamentary on behalf of my brother's estate by the Surrogate's Court of the State of New York, Nassau County.

6. My brother Sheldon (Shelly) was ten years older than me. Both of our parents died young. He was the most important person to me. We spoke multiple times a day, about anything. We knew each other better than anyone else. Shelly was my brother, my closest friend

and confidante, my protector and parent, when the situation called for it. He taught me about cars and how to drive a stick-shift, and we'd ride on his motorcycle. We would accompany each other to family gatherings.

7. By the time my father died, Shelly was married with a child, living on Long Island. I lived alone with our father. Shelly came and picked me up the same night my father died. He didn't want me to be alone. I moved in with him, his former wife and my nephew, Scott, for a year. His family welcomed me, and I never felt like a guest. He never asked for a penny in return. We'd all go on family ski trips together. When Scott was old enough, I taught him how to drive a stick shift, like his dad taught me.

8. Shelly was a captain with the FDNY. On September 11, 2001, I was abroad in Bali, watching the events in New York unfold in the hotel room. I couldn't reach Shelly by phone. I finally reached his wife. She said Shelly was downtown during the attacks. A news reporter let Shelly use his phone to call his wife to say he was alive, but he didn't know when he'd be coming home. The pile was still burning. A few days later, she told me Shelly was back home. He was exhausted and asleep, but I spoke to him several times from Bali. He was still working on the pile every day. He told me how awful it was having to look for bodies. But he said he was amazed at how generous people were to the firefighters, giving them new boots and fresh clothes. It was an incredible outpouring of support for them. He continued to work at Ground Zero through the spring of 2002. Sheldon didn't like to talk about his experience after that. You could ask, but he'd kind of avoid the question.

9. After he retired from the FDNY, in approximately 2003, Shelly started having trouble breathing. It was strange because he was always in very good shape, very fit and active. He was diagnosed with COPD and GERD. His stomach was upset all the time, or he'd have problems keeping food down. After his work at Ground Zero, he always had horrible sinus infections and was diagnosed with sinusitis and asthma.

10. My brother found a job at a fire inspection company. He was really the happiest person in the world at that time, because he was applying his knowledge of firefighting in a completely different environment. Their clients could be building management companies looking to implement new fire escape protocols in their buildings. He loved working with computers and creating safety plans. He gave presentations to prospective clients. It was very satisfying for him that his new job still allowed him to help people directly. He was very close

to his boss and co-workers. During this time, I noticed Shelly's breathing had become more labored. We'd meet for lunch, and he would have to stop every few blocks. He'd started gaining weight, too. He was always so athletic and in good shape, it wasn't like him.

11. During a routine medical check-up in late 2009 or early 2010, Shelly's prostate examination came back with an extremely elevated PSA number. Twenty was considered high, Shelly's was 300! A biopsy revealed he had prostate cancer. His doctor thought it could be easily cured with traditional prostate cancer surgery. He went to Sloan Kettering Memorial Cancer Center to get a second opinion. A second biopsy, done in March, showed that since the initial biopsy, it had spread to his bones. The oncologist said Shelly's prostate cancer was very aggressive. Because of the metastases, the cancer was too advanced for any type of prostate surgery. Still, the doctors at Sloan were willing to try to find other treatment options. It was obvious Shelly was in pain, even though he didn't complain about it. He was prescribed opiates. Shelly was concerned about getting addicted. He didn't take them because he wanted to stay alert, despite the pain. Eventually, he had to quit his job, but his boss continued to pay him.

12. The first treatment he was given was hormone therapy. The first couple of treatments yielded good results. His PSA number lowered significantly, and he was optimistic, but it rose even higher by the third treatment. The next step was chemotherapy. They tried radiation treatments and finally, experimental drugs. It was the same pattern with each treatment — optimism at first, followed by failure.

13. The chemo and radiation caused Shelly terrible pain and discomfort. He was awake all night, vomiting. He couldn't stand in the shower. Now, he needed the painkillers all the time. Eventually, the pills weren't strong enough, and he needed liquid morphine and an oxygen tank. He would get angry and impatient. A nurse came to his house, but he thought she was useless and had her leave. He got increasingly depressed and worried about the kids. He made me promise to take care of them. There were times where he needed to be admitted to Sloan for several days at a time. One night, I left briefly while he was asleep. He woke up, and I wasn't there, and it terrified him. He already had terrible memories of our mom dying at that same hospital.

14. Shelly knew he was running out of time. He gave me a list of all his passwords and had his will written while he was in hospice. He signed a Do Not Resuscitate order that he taped on the refrigerator. It was heartbreaking. There was so much he had to do before he died

and so many things he would miss when he was gone. His son Scott was grown up. Shelly would not get to have a relationship with his adult son or daughter, something he missed out on with his own father. His daughter Sari was approaching her 21st birthday, and Shelly was already in hospice. He had a necklace made for her, with a small replica of his badge. He gave it to her early, in case he missed her birthday. Shelly was aware that he was doing things “for the last time.” It was like he had a bucket list to complete with his family. You could see it in his eyes the last time we went to get ice cream together. He knew it would be the last time he would share this with us.


JOYCE E. BAROCAS

Sworn to before me this
7th day of July, 2022


Notary Public

Herminio A Hernandez
NOTARY PUBLIC, State of New York
No. 01HE6058120
Qualified in New York County
Commission Expires April 30, 2023

7/12/22

Estate of Mario Bastidas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X

GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
PENELOPE BASTIDAS**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK)

: SS.:

COUNTY OF QUEENS)

PENELOPE BASTIDAS, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 57-15 73rd Place, Maspeth, New York 11378.

2. I am currently 60 years old, having been born on May 13, 1962.

3. I am the wife of Mario Bastidas, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.

4. My husband passed away from colon cancer on April 1, 2017, at the age of 55. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On December 20, 2017, I was appointed the personal representative for my husband's estate by the New York State, Queens County Surrogate's Court.

6. My husband Mario and I had a beautiful relationship. There was nothing we didn't do together from washing dishes to taking care of our three puppies. In addition to taking care of our responsibilities together, we were a very active couple. We biked and went to the

gym every day. Mario was the life of the party, and everyone loved him. I'm from a very large family who live in Ecuador. When we're all together, it's more than 20 people. You can imagine how difficult it is to get all of us together in the same room, or how hectic and loud it can get when we are. You know who took charge of getting all my family together in Ecuador? It was Mario. He started a tradition where we go around the table and every person had a chance to talk, to say whatever they wanted. It doesn't matter if it was a happy story or a sad story. We went through every single person. He was the same way with his family, but with my family, it was a big production, and he loved it. He was "Uncle Mario," ready to do anything.

7. My husband worked as a paramedic for the New York City Fire Department. He was working on September 11, 2001, as part of the rescue and recovery efforts at Ground Zero. Mario made it home alive, but his colleague, Carlito, died that day. He and Mario were very close friends. Mario did not stop working until they found Carlito's body. That was in May 2002. Whenever Mario came home from work, he was covered with dust and debris. Despite that horrific time, Mario and I were blessed to be able to continue our lives together.

8. In May of 2011, Mario noticed he was bleeding from his rectum. He didn't think it was anything serious. Luckily, Mario was due for his annual FDNY health exam. I made sure the doctors knew about the bleeding. I was also suspicious because Mario had lost a noticeable amount of weight. We are very health and fitness conscious. Mario was very muscular and wasn't losing weight intentionally. The exam revealed he had lost 20 pounds. I demanded the doctors send Mario to a specialist for a colonoscopy or endoscopy, which they did. The specialist said he would call us when the results were back. It usually took a week, but we got a call right away. They didn't give us results on the phone. They wanted us to see the doctor as soon as possible. There, the doctor gave us the horrible news. Mario had colon cancer. From that day on, it was a nightmare.

9. Mario had surgery to remove part of his colon. The doctors said the cancer had spread to his lymph nodes and needed to be treated with chemotherapy. The doctors were very kind, they explained all the treatments and options to us. He wanted aggressive treatment. He was having two different kinds of chemotherapy—one had to be administered at the hospital. The other was portable: he would go to work while also having the drugs pumping through him. Even though he was nausea and dizzy, Mario absolutely refused to stop working.

10. The chemotherapy did not stop the cancer, and Mario's pain became much worse. We thought the chemo would give him some relief. The doctors found a small tumor hiding near his prostate, which is what was causing this new pain. The cancer had spread to his bladder. Mario started radiation therapy. The doctors said they were trying, but now the cancer has spread. We would talk about the different therapies and how he wanted to proceed. Mario would try any treatments they offered to him. The only option was radiation treatments. Doctors were not optimistic and warned that the pain and weight loss would continue to worsen. It did.

11. He would try to fight through the pain, but I would hear him crying. He didn't want to admit that he couldn't work like he used to. The FDNY offered to give him a job at headquarters, doing lighter work, but he wouldn't hear of it. Mario said he was "embracing the pain," because he had to prolong his life. All he wanted was to live longer so I wouldn't be alone. He was so worried about taking care of his wife, making sure I would be provided for, despite the agonizing physical pain. Nothing was helping Mario, but he wasn't ready to give up. In early 2016, he decided to seek alternative treatment in Ecuador, holistic healing. They used plants and herbs to try and heal the cancer. We used to blend it up for him to drink. He tried. He tried everything. It didn't work.

12. When we returned to New York, he was in and out of the hospital. In addition to the pain and weight loss, his extremities were severely swollen, because of a blood-clot in his leg. He couldn't walk. When he spoke, I could barely hear him. Mario became incontinent and needed to wear diapers. He suffered terrible fevers. He was a strong, muscular man, who was slipping away. He was skin and bones. He had a port put into his chest to administer his medication. He had wires everywhere, and he had a colostomy bag. He'd look at himself in the mirror and say, "Look at me now, baby. How can you still love me like this? He'd say the cancer had won. It beat him.

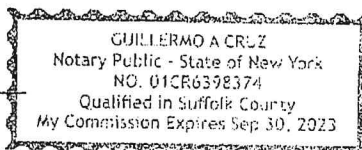
13. Mario had so much depression and anxiety. He was having nightmares about dying. Every day, he would say that he didn't want to die. He didn't want to leave me. He got so frustrated and angry. Once, he started pulling out all the tubes from his body. There was blood everywhere. He wanted everything taken off him, and he was angry when I wouldn't do it for him. I called 911 because he was out of control. The doctors said it was time for us to consider palliative or hospice care. In November 2016, Mario knew there was nothing left to try. No more treatment. He wanted to go home and enjoy whatever time he had left.

14. Mario wanted to die at home. We prepared everything he would need on the first floor of our house—we got a hospital bed for him, and I put my bed next to it. I would stay next to him during the day. When I worked at night, we had a home aide take care of him. He couldn't keep food down, sometimes he would throw up on me. He'd be so embarrassed and apologetic. The day before he died, he told me to call the ambulance. I was standing next to him, but he couldn't see me. I put his hand in mine. He knew he was dying and needed to get to the hospital because of the pain and the bleeding. Even on his deathbed, he didn't want to leave a mess for me to clean. My husband fought like a warrior to stay alive.

Penelope Bastidas
 PENELOPE BASTIDAS

Sworn to before me this
13th day of July, 2022

[Signature]
 Notary Public



Estate of Ronald Robert Brenneisen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
CHASE CHARLES BRENNEISEN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF SOUTH CAROLINA)
 : SS.:
COUNTY OF RICHLAND)

CHASE CHARLES BRENNEISEN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 137 Roper Pond Circle, Columbia, South Carolina 29206.

2. I am currently 39 years old, having been born on January 22, 1983.

3. I am the son of Ronald Robert Brenneisen, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.

4. My father passed away from pancreatic cancer on September 12, 2014. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. On July 16, 2015, I was appointed personal representative of my father's estate by the Circuit Court of the Fifth Judicial Circuit in and for Citrus County, Florida.

6. My father and I had a really close relationship. We would go fishing on the weekends, have barbecues, and go to church on Sundays. Whenever I had any questions or doubts

in life, my father would give me advice. He would never steer me wrong. We would talk about relationships, careers, everything in life. I went to college and worked in construction after. I was a little uncertain in life, so my father guided me towards a career in truck driving. I got my commercial driver's license and have been driving trucks ever since. I'm grateful for my father's guidance. We were very close.

7. My father was with the FDNY for twenty-five years. He could've retired after twenty years, but he stayed on for an extra five. My father loved the brotherhood of the Fire Department. After 9/11, he told me he had never seen anything like that in his life. The steel was all mangled. He spent hundreds of hours working in the pit. He told me it was a like a war zone. The World Trade Center was a complete mess, and he spent months looking for survivors. He spent hundreds of hours breathing in the dust at Ground Zero.

8. After 9/11, my father started to have lung issues. Only one of his lungs was really working. My father would go every year to the FDNY doctor for a checkup. About a month before he found out he had cancer in 2014, he wasn't feeling himself. He didn't look right. He thought he might have had ulcers, as his stomach was really bothering him. One day, he just couldn't deal with the pain. He found out he had the cancer, and it all deteriorated so quickly from there. It happened really fast.

9. The day he went to the hospital, he had so much fluid in his legs that they were triple the normal size. He spent a few days in the hospital and went to hospice. It wasn't even a full week until he died. He and his wife made the decision to go to hospice. I know these 9/11-illnesses happened to a lot of firefighters, but it was scary to see it happen to my father. There wasn't much time.

10. My dad was a tough guy, but the cancer destroyed his body. His legs and arms were filled with fluids. He was agitated and upset. It was a horrible time. He hated the food they fed him in the hospital and in hospice. He didn't have much mobility; he could hardly get to the bathroom. He was on a lot of medication to deal with the pain. When he was in hospice, they kept giving him morphine. I'll never forget—he really didn't want morphine, and the nurse gave it to him. The nurses shoved the tube down his throat to administer the morphine. It was so hard to watch. After the final dose of morphine, which he refused, he couldn't even speak anymore. It was just one bad thing after another.

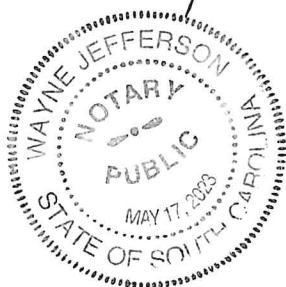
11. I think my father knew this was going to happen to him, and that he was keeping it under wraps from us. He realized that he didn't have long to live once he was given the cancer diagnosis. For my dad to be quiet around us, it was just strange. He shut down; he was suffering a lot emotionally.

12. My father was the kind of guy who would help anyone. When I finished college, my father paid off my college tuition without me asking. He was always doing great things, we never had to ask for anything. My father was so giving. He helped me, my sister, anyone who needed it. He was a really great guy and an awesome father. Every year, when my father's birthday comes around, the holidays, even the anniversary of 9/11, I try to talk to my children about him. His premature death is an unfortunate consequence of his selfless action to help following the 9/11 attacks. Had he not been exposed to the toxic dust, he would still be here today.

Chase C Brenneisen
CHASE CHARLES BRENNEISEN

Sworn to before me this
15 day of July, 2022

Wayne Jefferson
Notary Public



Estate of Miao Ling Cao

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
ZE XI CAO**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF CALIFORNIA)

: SS.:

COUNTY OF ORANGE)

ZE XI CAO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 18972 Santa Clara Circle, Fountain Valley, California 92708.
2. I am currently 47 years old, having been born on July 23, 1974.
3. I am the brother of Miao Ling Cao, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my sister's estate.
4. My sister passed away from metastatic breast cancer on January 2, 2015, at 45 years old. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On October 15, 2015, I was issued Letters Testamentary on behalf of my sister's estate by the Surrogate's Court of the State of New York, Queens County.

6. My family and I moved to the U.S. in 1982. As immigrants, my parents had to work hard at blue collar jobs. This caused my sister to step up and help co-parent my siblings and me. She became like my second mother. We had a tremendous relationship and were very close. I am the youngest of my siblings and really looked up to her. She did everything for us that was needed when our parents could not. She cooked, cleaned, and helped us all with our schoolwork. She always took charge. As we grew older, she continued to be there for me and supported me in all my endeavors. When I developed an interest in tennis, she went out of her way to buy me a racket. During college, I fell ill with stomach pains that forced me to take some time off from college. She was there for me and provided me with as much care as she could.

7. At the time of the attacks on 9/11, my sister was working close to 1 New York Plaza. She saw many horrors on that day. She witnessed the first plane crash into the towers. As she tried to escape from the World Trade Center site, she witnessed more horrors still. She saw people jumping from the towers to their deaths. She walked across the Brooklyn Bridge as the events transpired and met with my brother once she crossed the bridge. Although the events she witnessed shook her, she returned to work once the air was declared safe to breath. She would continue working from that office for another four years.

8. When my sister began to feel ill, she made an appointment to try to get some testing done. She was nervous about her appointment and invited me along with her. I was there when she received the devastating diagnosis from her doctor. She had stage IV breast cancer. She put on a brave face and fought tremendously through it. Her cancer even went into remission for a short while before we found out it had moved to her neck and required surgery.

9. My sister was a very strong person. She grew frustrated throughout her illness with her inability to eat. She was constantly on medication and going through treatments. There was no end in sight. Still, she remained strong. She went through quite an emotional journey being diagnosed with cancer twice. She was sad. She knew she would never see her daughter grow up. Yet, she rarely ever complained. She kept everything to herself.

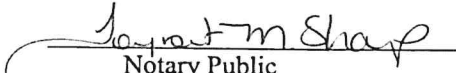
10. My sister was always so bubbly and full of life. But her illness and suffering were hard on her. She was always the rock of the family and there to care and give advice. Now, she was the one who needed help. I felt a great sadness watching my sister come to grips with her

mortality. It was so disheartening to see a healthy, vibrant, and life loving person fade the way she did.



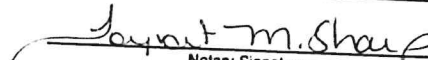
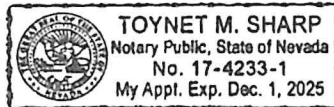
ZE XI CAO

Sworn to before me this
11th day of July, 2022


Notary Public

State of Nevada
County of Clark

Subscribed and sworn to (or affirmed) before me
on this 11th day of July, 2022
by Ze Xi Cao


Notary Signature

Estate of Robert Royce Codner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
VICTORIA M. CODNER**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF ORANGE)

VICTORIA M. CODNER, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 44 High Street, Apt. 512, Chester, New York 10908.
2. I am currently 74 years old, having been born on April 3, 1948.
3. I am the wife of Robert Royce Codner, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my husband's estate.
4. My husband passed away from metastatic melanoma on November 28, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On June 5, 2014, I was issued Letters Testamentary on behalf of my husband's estate by the Surrogate's Court of the State of New York, Orange County.
6. Robert and I were married for 43 years. We had a wonderful relationship. We were very involved in each other's lives. We were a close family, always doing activities together and taking trips. We took a family cruise to Alaska, and we had planned to travel a lot

more together. We camped together with our children. He was a wonderful husband, father, and grandfather. My children and grandchildren miss him terribly. He was a family man and a good provider.

7. Robert was an FDNY fireman. He was very private about his experiences at the World Trade Center on and after 9/11/2001. He didn't want me to know a lot, because he was a protector. I remember taking his uniform to and from the dry cleaners for funerals for a whole year. We lost a lot of friends in the attacks on the World Trade Center. Robert was probably working for months down at the pile. He was there all the time. It was devastating. My son was a Port Authority Detective and he lost most of his friends too. I was worried about him also. How was he going to get through this? It was a difficult time for our family. We're a very close family, so we all worry about each other.

8. Robert had melanoma on his face once in 2006, which was treated with surgery. He was in surgery at the VA Hospital for twelve hours to remove the melanoma. They took out his salivary glands and the lymph nodes on his neck. He had to have Botox injections to control his chewing and swallowing after the surgery. But otherwise, he was fine. After that, Robert went for PET scans, and everything kept coming back okay. One day, a few years later, he was coming up the stairs and he said, "I can't breathe at all." I took him to the cardiologist, who saw him right away. The doctor saw that he had blood clots in his lungs and admitted him to the hospital. An oncologist came in and ran more tests, and that's how we found out Robert had malignant melanoma. When the report came back, he said, "Vic, read this." That was his way of telling me that he wasn't going to make it. When I read the report, I said, "Bob, this is not good. It's not good at all." That was really it. At that point, we knew what was going to happen. We knew we had limited time together.

9. The last few months he was losing weight extremely quickly. He was anemic. We had to go back and forth to the hospital for him to receive IVs of iron and blood, which strengthened him a little bit. The weight loss was severe; we had nutritionists and nurses come to the home to try to help him. But it wasn't working, the cancer was taking over his body. Robert was a strong, 6'1 man, a good-looking guy, but when he was ill, I couldn't even recognize him anymore.

10. Robert was used to doing everything for himself. We had to bring people into our house to help us, which upset him tremendously. He used to mow our lawn and shovel our snow. When he got sick, we had to have other people come in and do it. He was frustrated about losing his independence. But Robert didn't sit there and whine. He was a very brave man.

11. He couldn't take morphine at all, so they had him on fentanyl pills. It worked for a while, but when the pain got really bad, nothing could help him. He was still coherent at that time, so the oncologist asked us to consider a feeding tube, and he said yes. But the cancer was pushing out the feeding tube, and it didn't work. Especially after the feeding tube failed, he was in a tremendous amount of pain. I could see in his eyes how much he was hurting. At the end, he couldn't speak at all. He had thrush from the tube, in his mouth and throat.

12. He was a fighter. He would never give up. Robert gave every last try to survive, because he wanted to be with his family. He would say, "If I could just get one more year." The physical and mental pain and anguish was really bad. Robert was my children's hero. He was always there for them. He should have had more years with me, his children, and grandchildren. He missed out on many family events and milestones.


VICTORIA M. CODNER

Sworn to before me this
18 day of July, 2022


Notary Public

DOREEN DIEMER
Notary Public, State of New York
No. 01DI6073350
Qualified in Orange County
Commission Expires April 22, 2026

Estate of Joseph Francis Fitzpatrick Sr.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF
EDITH MARIE PLAIA**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF OCEAN)

EDITH MARIE PLAIA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 308 Lake Crystal Brook Drive, Little Egg Harbor, New Jersey 08087.
2. I am currently 54 years old, having been born on April 12, 1968.
3. I am the daughter of Joseph Francis Fitzpatrick Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of the claim on behalf of my father's estate.
4. My father passed away from metastatic lung cancer on March 12, 2017. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. On March 23, 2017, I was issued Letters Testamentary on behalf of my father's estate by the State of New Jersey, Ocean County Surrogate's Court.
6. My dad and I would talk every day. We would do lots of activities together, like barbecues and family parties. He was my wingman. He was always there for me when I was growing up. My parents divorced when I was fourteen years old, and my dad was a strict

parent—to a point. My dad would always get me out of trouble. When I got pregnant at eighteen, my dad was the only one who was there for me. I was married at twenty-one, and he walked me down the aisle. My father was extremely close with my son, because my son's biological father was not in his life. My father helped me raise my son, until I got married, and continued to help me after I was married.

7. My father worked as a foreman for the Department of Transportation. He was part of the clean-up crew at Ground Zero, starting on 9/11/2001. He operated heavy machinery to clear debris from the pile. His job was to lift up debris from the buildings and search for victims and bodies underneath. He was one of the few people who knew how to operate the machinery over the rough terrain of the debris. My dad was a Marine who served in Vietnam. He had tears in his eyes when he told my siblings and me that this was even worse than Vietnam. He was mentally, emotionally, and physically wrecked by the 9/11-cleanup experience. My father worked on the World Trade Center “pile” until about 90% of the debris was removed, approximately May 2002. Some nights, he worked so late that he wouldn't even come home.

8. My father believed in eating right and doing right for his body. He was a healthy person. But his health was never the same after 2001. He would go to the doctor yearly for World Trade Center Health Program checkups. A few months after 9/11, the doctors told him he had asthma. Then, he had bronchitis. He would have pneumonia three times a year, which wasn't normal. After one visit in early January 2017 where he received an X-Ray, the doctors told me he needed a biopsy. The biopsy revealed that he had metastatic Stage IV lung cancer.

9. My dad didn't want to do chemotherapy, but he gave it a try. The first time he went for the chemo treatment, he didn't know where he was. He lost his memory. When I ran over to the chemotherapy center, he said, “How did you get here? What am I doing here?” The chemotherapy really took a toll on him. But it didn't work. His cancer metastasized to his brain and body. They put him on oxygen right away and sent him home.

10. He really never showed that he was in pain, but we knew he was. He always wanted to be strong for us. Until his mental state started to go, he was very stoic. He rarely complained and wanted to enjoy life. He wanted to enjoy his retirement down to the very last year. He loved driving, but we had to take his keys away. That really destroyed him. I even

remember him yelling at us when we tried to give him a shower or get him off the toilet. He really wanted to be independent.

11. My father had terrible chest pain. He couldn't really move much out of the bed. He was constantly grabbing at his chest, his side, and his head because he had terrible migraines. He couldn't take care of himself without help. He couldn't even make it to the bathroom to urinate on his own. He spent most of his days going from the couch to the bed at home or in the hospital room. He was on oxygen and later had to be on morphine. He passed away in March 2017—that's how fast his illness progressed.

12. They say you feel the most grief the first six months, maybe a year, after someone's death. But it's been five years since my father's death and it's still so hard. There's not a day that goes by that my father is not missed. He was a selfless individual who didn't think twice about assisting after the 9/11 attacks. Had he not been exposed to the toxic air down there, he would still be with us today.

Edith Marie Plaia
EDITH MARIE PLAIA

Sworn to before me this
11th day of July, 2022

Kimberly S. Yarbrough
Notary Public

